

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ROBERT WESLEY ROBB,

Defendant.

Case No. 1:24-MJ-100

Filed Under Seal

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jordan Jenkins, being first duly sworn, state:

INTRODUCTION AND AGENT BACKGROUND

1. I make this Affidavit in support of an application for a criminal complaint and arrest warrant for ROBERT WESLEY ROBB.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI), and I have been so employed for since 2021. I am currently assigned to the FBI's Washington Field Office's securities fraud squad, which has investigative responsibility for complex financial crimes. I have participated in investigations involving securities fraud, investment fraud, money laundering, and cybercrime. I have training and experience in the enforcement of the laws of the United States, including the preparation and presentation of search warrant affidavits and the execution of search warrants, as well as extensive training in investigating white-collar crimes. I have received the Chainalysis Ethereum Investigations and Certified Anti-Money Laundering certifications, and training in the tracing of funds generated from illicit activity, including cryptocurrencies, through the international banking system and blockchain technologies.

3. I am familiar with the information contained in this Affidavit. This Affidavit is based upon information from several sources, including my personal observations, information

provided to me by other law enforcement agents and officers, written statements made by ROBB to victims and witnesses, documents and financial records provided by different entities and individuals, and publicly available information. This Affidavit is offered for the sole purpose of establishing probable cause in support of a criminal complaint against ROBB and does not set forth all of the facts of this investigation.

4. The proposed criminal complaint charges ROBB with one count of wire fraud. Based on my training and experience and the facts as set forth in this Affidavit, however, I submit that there is probable cause to believe that ROBB has committed violations of not only 18 U.S.C. § 1343 (Wire Fraud), but also 18 U.S.C. § 1956(a)(1)(B)(i) (Concealment Money Laundering) and 18 U.S.C. § 1957 (Unlawful Monetary Transactions) (collectively, the “subject offenses”), in the Eastern District of Virginia and elsewhere.

CRYPTOCURRENCY BACKGROUND

5. **Virtual Currency:** Virtual currencies are digital tokens of value circulated over the Internet. Virtual currencies are typically not issued by any government or bank like traditional fiat currencies, such as the U.S. dollar, but rather are generated and controlled through computer software. Different virtual currencies operate on different blockchains, and there are many different widely used virtual currencies currently in circulation. Bitcoin (or BTC) and ether (ETH) are currently the most well-known virtual currencies in use. BTC exists on the BTC blockchain and ETH exists on the Ethereum network. Typically, a virtual currency that is “native” to a particular blockchain cannot be used on a different blockchain. Thus, absent technological solutions those native assets are siloed within a specific blockchain. For instance, ETH (the native token on the Ethereum network) cannot be used on other networks unless it is “wrapped” by contract code. This wrapping process results in what is called Wrapped ETH or WETH.

6. **Virtual Currency Address:** Virtual currency addresses are the particular virtual locations to which such currencies are sent and received. A virtual currency address is analogous to a bank account number is represented as a string of letters and Virtual currency addresses are the particular virtual locations to which such currencies are sent and received. A virtual currency address is analogous to a bank account number is represented as a string of letters and numbers.

7. **Virtual Currency Wallet:** There are various types of virtual currency wallets, including software wallets, hardware wallets, and paper wallets. A virtual currency wallet allows users to store, send, and receive virtual currencies. A virtual currency wallet can hold many virtual currency addresses at the same time.

8. Wallets that are hosted by third parties are referred to as “hosted wallets” because the third party retains a customer’s funds until the customer is ready to transact with those funds. Conversely, wallets that allow users to exercise total, independent control over their funds are often called “unhosted” wallets.

9. **Blockchain:** Many virtual currencies publicly record all of their transactions on what is known as a blockchain. The blockchain is essentially a distributed public ledger, run by the decentralized network of computers, containing an immutable and historical record of every transaction utilizing that blockchain’s technology. The blockchain can be updated multiple times per hour and records every virtual currency address that has ever received that virtual currency and maintains records of every transaction and all the known balances for each virtual currency address.

10. **Blockchain Explorer:** These explorers are online tools that operate as a blockchain search engine allowing users the ability to search for and review transactional data for any addresses

on a particular blockchain. A blockchain explorer is software that uses API¹ and blockchain nodes to draw data from a blockchain and uses a database to arrange and present the data to a user in a searchable format.

11. **Virtual Currency Exchanges (VCEs):** VCEs are trading and/or storage platforms for virtual currencies, such as BTC and ETH. Many VCEs also store their customers' virtual currency in virtual currency wallets. As previously stated, these wallets can hold multiple virtual currency addresses associated with a user on a VCE's network. Because VCEs act as money services businesses, they are legally required to conduct due diligence of their customers (i.e., KYC checks) and to have anti-money laundering programs in place (to the extent they operate and service customers in the United States).

12. **Blockchain Analysis:** As previously stated, while the identity of the virtual currency address owner is generally anonymous, law enforcement can identify the owner of a particular virtual currency address by analyzing the blockchain (e.g., the BTC blockchain). The analysis can also reveal additional addresses controlled by the same individual or entity. "For example, when an organization creates multiple [BTC] addresses, it will often combine its [BTC] addresses into a separate, central [BTC] address (i.e., a "cluster"). It is possible to identify a 'cluster' of [BTC] addresses held by one organization by analyzing the [BTC] blockchain's transaction history. Open source tools and private software products can be used to analyze a transaction." *United States v. Gratkowski*, 964 F.3d 307, 309 (5th Cir. 2020).

13. In addition to using publicly available blockchain explorers, law enforcement uses commercial services offered by several different blockchain-analysis companies to investigate virtual

¹ API stands for application programming interface, which is a set of definitions and protocols for building and integrating application software.

currency transactions. These companies analyze virtual currency blockchains and attempt to identify the individuals or groups involved in transactions. Through numerous unrelated investigations, law enforcement has found the information provided by these tools to be reliable.

PROBABLE CAUSE

14. As explained further below, I respectfully submit that there is probable cause to believe that, beginning no later than November 2022 and continuing through the present, in the Eastern District of Virginia and elsewhere, ROBERT ROBB has devised and intended to devise a scheme and artifice to defraud investors to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals and sounds, in violation of Title 18, United States Code, Section 1343 (Wire Fraud). To wit:

15. On or about September 4, 2023, the defendant, using an electronic device located outside the Commonwealth of Virginia, transmitted a message via the internet to Investor A, an individual located in the Eastern District of Virginia.

16. I also submit that there is probable cause to believe that ROBERT ROBB conducted financial transactions knowing the property involved in such transactions represented the proceeds of Wire Fraud, and did so in order to conceal or disguise the nature, location, source, ownership, or the control of the proceeds of the fraud scheme, in violation of 18 U.S.C. § 1956(a)(1)(B)(ii) (Concealment Money Laundering). In addition, there is probable cause to believe ROBB knowingly engaged in monetary transactions in criminally derived property of a value greater than \$10,000 involving property derived from Wire Fraud, in violation of 18 U.S.C. § 1957 (Unlawful Monetary

Transactions), in the Eastern District of Virginia and elsewhere in connection with his conduct in the criminal scheme.

17. Section I provides general background of the investigation and summarizes ROBB's role and conduct. Section II summarizes certain investor complaints that the FBI has received relating to ROBB, including a complaint by an investor located in the Eastern District of Virginia. Section III summarizes ROBB's conduct as it relates to money laundering, including but not limited to ROBB's use of investor funds for personal expenses. Section IV details ROBB's ongoing execution of the criminal scheme.

I. Background & Summary

18. ROBB is a resident of Frederick, Colorado. However, upon information and belief, ROBB is currently located in Las Vegas, Nevada.

19. In or around January 2003, ROBB pleaded guilty to two counts of wire fraud in the United States District Court for the Northern District of California. According to publicly available records, ROBB defrauded investors by falsely stating Las Vegas based casinos would be using his prototype gambling machine and that he had received endorsements from well-known figures. Contrary to his representations to his investors, ROBB used investor funds to gamble in Las Vegas and to buy new vehicles. When investors refused to invest more money, ROBB threatened investors' lives and safety. ROBB was sentenced to 27 months and ordered to pay \$4.1 million in restitution to 18 victims.

20. In or around December 2023, FBI was alerted to a criminal scheme through which ROBB solicited investment in a Maximum Extractable Value (MEV) cryptocurrency trading bot (hereafter the "MEV bot"). In my training and experience, I know MEV cryptocurrency trading bots are software tools that analyze arbitrage opportunities by manipulating the sequence of transactions within a blockchain block and subsequently execute strategic transactions to produce a profit. The

FBI investigation included interviews with victims and witnesses, a review of documents and communications provided by victims and witnesses, and analysis of bank and virtual currency exchange account records.

21. The ways, manner, and means by which ROBB sought to accomplish the scheme and its objectives included, but were not limited to, the following:

- a. ROBB recruited prospective investors by touting his own experience and expertise, his purported success in various cryptocurrency and Web3² projects he managed or contributed to, and his purported association with well-known and reputable individuals within the cryptocurrency investment sphere.
- b. ROBB made materially false, fraudulent, and misleading representations—and material omissions—about the progress and capabilities of the MEV bot, the timing of when he planned to “launch” the bot, how investors’ money would be used, and the profits investors would supposedly realize through the MEV bot.
- c. ROBB obfuscated the location and use of investment funds through the use of multiple virtual currency addresses, virtual currency exchange accounts, and bank accounts.
- d. ROBB concealed and misrepresented the true disposition of investor funds. Specifically, ROBB used investor funds to pay for personal expenses such as luxury vacations, vehicles, and a luxury suite at the Denver Broncos football stadium.

II. Investor Complaints

22. The FBI has received numerous investor complaints from more than ten investors alleging losses totaling more than \$2.2 million. These complaints include allegations of

² Web3 is a phrase used to refer to the next “version” of the internet that is focused on ideas such as decentralization and blockchain technologies.

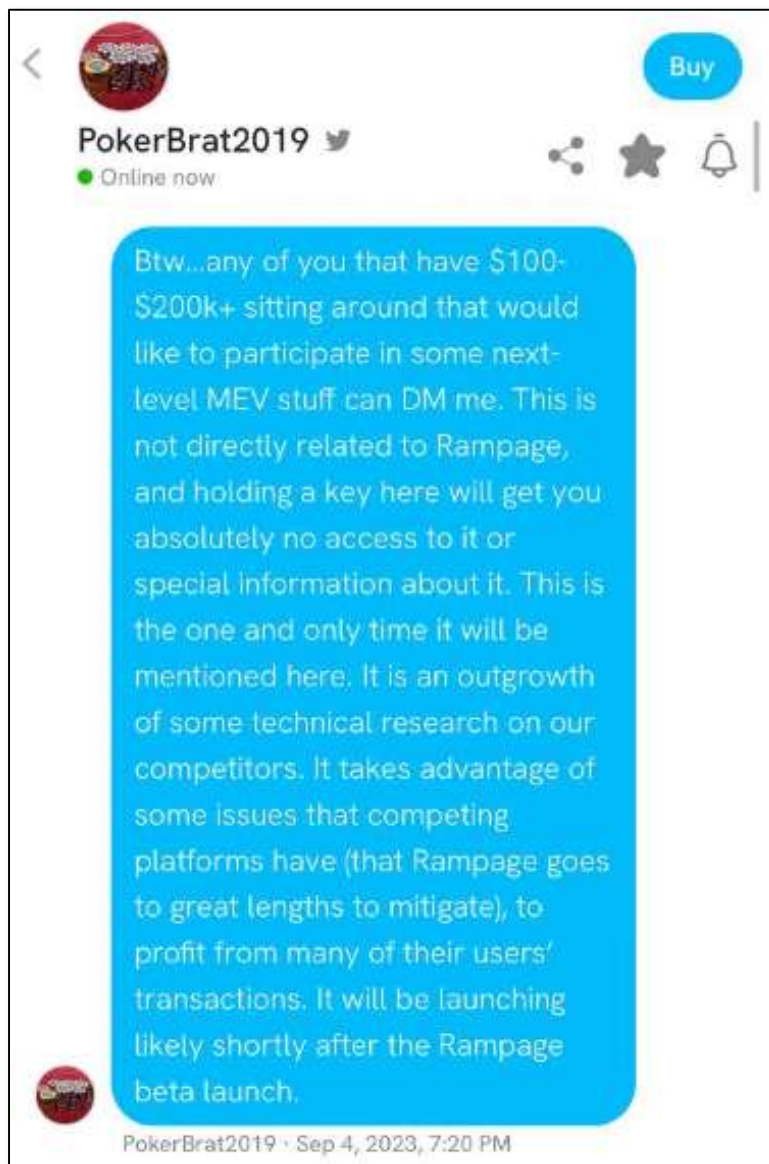
misrepresentations and misuse of investor funds for personal expenses. Through its own review of financial records and interviews with investors, the FBI has identified about \$1.5 million in funds it has either confirmed or believes were from investors, though investigation is still ongoing. Some of the investor complaints are summarized as follows:

Investor A

23. Investor A is a resident of Brambleton, Virginia, which is within the Eastern District of Virginia. At all times that Investor A was communicating with ROBB other than September 7-10, 2023, Investor A was located within the Eastern District of Virginia. In or around September 2023, Investor A purchased keys to ROBB's Friend.Tech account "PokerBrat2019." In my training and experience, I know Friend.Tech is a blockchain-based social platform. Its main feature is "token-gated chats" through tokens called "keys" that can be purchased and traded. Users gain access to other users' token-gated chats through the purchase of keys. In other words, Friend.Tech allows users to purchase access to chat rooms with specific individuals.³

24. On or around September 4, 2023, ROBB posted in his Friend.Tech chat advertising an opportunity to invest in a Maximum Extractable Value (MEV) cryptocurrency trading bot. ROBB invited individuals that have "\$100-\$200k+ sitting around" and would like to "participate in some next-level MEV stuff" to send him a direct message to learn more. A screenshot containing ROBB's representations on Friend.Tech is included below:

³ ROBB has received income from the sale of access to his Friend.Tech account. As of February 2024, it appears he has received approximately \$150,000. This information is publicly available through Friend.Tech. Law enforcement has not identified this money being transferred into ROBB's bank accounts.



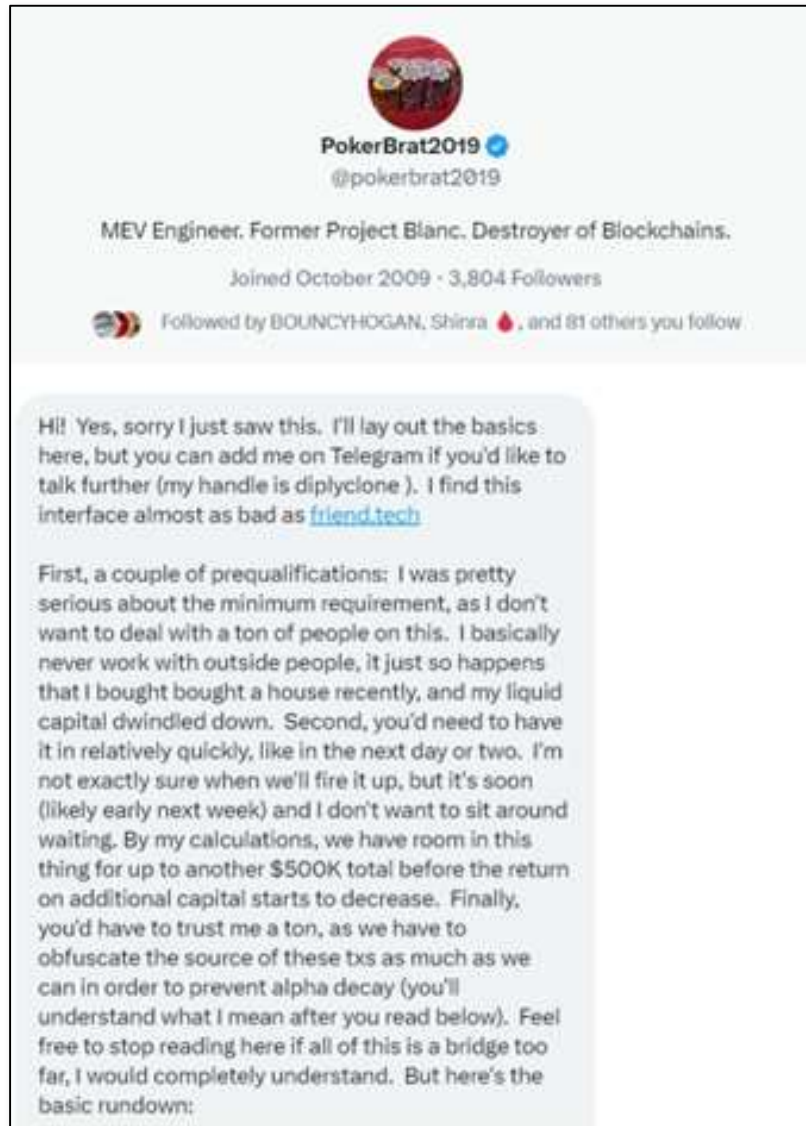
25. A review shows that on September 4, 2023, the same day ROBB sent the above message, ROBB accessed his Coinbase account from an IP address geolocated in Las Vegas, Nevada.

26. In ROBB's Friend.Tech message, as shown above, ROBB references an entity called "Rampage." Based on information obtained in this investigation, I know that Rampage is a separate automated cryptocurrency trading platform that ROBB advertised but also failed to launch.

27. On or about September 7, 2023, Investor A sent a direct message to ROBB's X account, @pokerbrat2019, and discussed the opportunity to invest in the MEV bot. While

communicating on X, ROBB made multiple representations to Investor A about the MEV bot and told Investor A that the investment must total at least \$100,000.

28. ROBB explained to Investor A how the MEV bot would work, how Investor A's investment would be used by as capital by the MEV bot to trade cryptocurrency (i.e., not to fund ROBB's personal or even software development expenses), how the origin of Investor A's investment must be "obfuscate[d]," and how ROBB and Investor A would split profits. Further, ROBB told Investor A that the MEV bot would make millions of dollars and assured Investor A that this was a low-risk investment. Additionally, ROBB insisted Investor A must invest within a "day or two," because he expected the bot to be operational "soon (likely early next week)." In my training and experience, I know that individuals engaged in investment fraud will often seek to create a sense of urgency with investors so that investors are pressured to invest quickly without asking questions that may alert the investor to the truth about the investment. Screenshots containing ROBB's representations on X to Investor A are included below:



Basically, the way that Maestro/Unibot work is that users set limit orders, and then the Maestro/Unibot watch the chain and execute those rules when market conditions the user has set are met (sniping is a different animal, though we can see how many users are setup to snipe a given coin as well). Many of these rules remain static, because human users are setting them, and they don't tend to change them often (especially on the sell side). This is the Achilles heel of these platforms. It's also crucial to

understand that most transactions from these platforms are private - they bypass the public mempool. This ostensibly sidelines MEV bots - after all, if we can't see the transactions, we cannot profit from them. But if we were the only ones to see them, we would have no competition and would make millions.

So I wrote something to figure out which addresses are using these services, and then it watches their trades on-chain to extrapolate the rules that each user has set. I can backtest how accurate these predictions are, without risking a single dime. I have been doing exactly this over the past few weeks, and I'm up to ~93% accuracy (when it makes a prediction). It's theoretically good enough already to make enormous returns, but I am pushing to get it to ~95%. I expect to hit that within a day or two of the Rampage launch. Since we can predict what they are going to buy or sell, when, the gas price at which they will do it, and in what amounts, even though we cannot see their transactions, we can still profit from them. We can backrun them, hijack any backruns the platform itself was going to do, sandwich them, etc. We will be the only people doing it, because nobody else knows the transaction exists. Backrunning is normally enormously competitive, but we'll have zero competition. Backrunning just means landing a transaction behind their buy that does an arbitrage with a different pair that has a lower price than the pair they bought from.

Additionally, there is a tremendous amount of overlap in these orders. We can warehouse tokens their users are actively buying, because we know what will trigger them to buy or sell. When they buy, we can dump on them. There are a few bots making up to 6 figures per day doing this, but they are doing it with fierce competition. We have none for this because nobody can see the txs we are targeting. I call this a "blind delayed sandwich". We know which tokens are most active among their users, and what conditions will make them buy or sell. We can hold the correct tokens and always make a profit when those transactions inevitably occur, and we can even cause those transactions to occur by pushing prices around because we know how much of what tokens will be bought or sold when the price hits a certain number.

So, this is all well and good but quite capital intensive. It also involves some holding risk, although it's very close to zero because the activity gets so concentrated through these bots (everyone is going after the same thing).

Lmk if you'd like to move forward. Basically you'd get 50% of the profits attributable to your portion of the bankroll, which is currently around \$800K.

29. Investor A and ROBB continued their communication on Telegram. ROBB used the Telegram name "DiplyClone." On Telegram, ROBB provided Investor A an Ethereum virtual currency address to send his initial \$100,000 investment. On or about September 8, 2023, Investor A sent ROBB an amount of USD Coin (USDC) totaling approximately \$100,000. The funds provided by Investor A were subsequently transferred through multiple virtual currency addresses and then into ROBB's Coinbase account.

30. In the weeks that followed, ROBB repeatedly promised Investor A that the MEV bot would be launched shortly, and then subsequently provided multiple excuses for why the MEV bot had not yet launched. Among other things, ROBB claimed he was dealing with an illness and facing other issues in the Rampage development process that required his attention. In my training and experience, I know that individuals engaged in investment fraud will often seek to conceal the true status of the investment, such as the progress and launch of the bot, so that they can continue the fraud and avoid alerting investors to the true disposition of the funds.

31. On or around October 27, 2023, ROBB told Investor A that a new investor was interested in making a \$300,000 investment in the MEV bot. Such an investment would dilute Investor A's profits, so ROBB gave Investor A the chance to make an additional investment. ROBB also told Investor A the MEV bot would launch "in the next week or so." On or around October 28, 2023, Investor A sent an additional \$50,000 to an Ethereum virtual currency address provided by ROBB. The funds provided by Investor A were subsequently transferred through multiple virtual currency addresses and then into ROBB's Coinbase account. A screenshot containing ROBB's October 27 representations on Telegram are included below:

Just a bot update:

Friday is going to be devoted to getting Rampage finally up and running, but it appears that we are finally ready to start running tests later this weekend and should actually be printing next week.

The social platforms are going up as soon as I get a domain transfer that I purchased, which I think will also occur Friday. I bought [SocialFi.tech](#), originally I was going to use [FriendFi.tech](#), but some people think that's too close to [Friend.tech](#). As a bot backer, you'll be getting a large helping of points within that app right off the bat, along with a multiplier above that of key holders. These points won't just remain stagnant for long; I have a plan to make them liquid within a week or two of the platform launch.

Finally, with regard to the bot. A friend of mine I had lunch with today was impressed with the bot progress and wants to put in \$300k. We could actually use the capital, and it will insulate you even further by spreading out the small risk profile we have even further. But I also told him that I already have people backing it, and that I'd give you and the others a right of first refusal, and reduce the amount I'm allowing him to put in by anything existing backers want to put in, if anything.

So, now that it appears that we are finally about to launch in the next week or so, if you'd like to increase your exposure, lmk in the next 24 hours and I'll send you an address. If not, it's completely fine. There's no minimum amount by which you can increase it, and the max is the \$300k he wants to put in.

 edited 4:21 AM

32. On or around November 7, 2023, ROBB informed Investor A that he was going to start testing the bot that evening. Investor A responded that he was looking forward to seeing the evidence of the transactions. Early the next morning, ROBB informed Investor A that the bot had not yet conducted any transactions because it was still “warming up.”

33. On or around November 8, 2023, Investor A requested a refund from ROBB because they had not received any returns or evidence ROBB created a MEV bot. ROBB provided multiple excuses for why he could not immediately refund Investor A; for example, ROBB claimed to be a

victim of extortion attempts and insisted his virtual currency exchange account was frozen. Despite ROBB repeatedly promising him his refund by various dates, as of the date of this affidavit, Investor A has not received a refund from ROBB nor profits from the MEV bot.

Investor B

34. In October 2022, Investor B received a message from ROBB's X account, @pokerbrat2019, seeking investment in a MEV bot. Similar to the statements made to Investor A, ROBB told Investor B he created a MEV cryptocurrency trading bot that would generate millions of dollars in profit. ROBB told Investor B their investment would be used by the MEV bot to execute trades and move the market. Profits from the MEV bot would be split "fifty-fifty" between ROBB and Investor B. ROBB made representations to Investor B that are similar in nature to those captured in the screenshots provide by Investor A.

35. From in and around November 2022 to June 2023, Investor B invested a total of approximately \$514,443 with ROBB. From November 2022 to May 2023, Investor B sent multiple USDC transactions totaling approximately \$411,943 to Ethereum addresses provided by ROBB. A review of records shows ROBB transferred the funds through multiple virtual currency addresses before depositing the funds at ROBB's Binance account. From April 2023 to June 2023, Investor B sent approximately eight wires totaling \$132,500 to ROBB's personal bank accounts. For example, on April 13, 2023, Investor B wired \$50,000 from his Bank of America account to ROBB. This wire transfer was routed through a server located in the Eastern District of Virginia.

36. Investor B and ROBB met in person on two occasions. During their interactions, ROBB assured Investor B the MEV bot would be launched imminently. When the MEV bot failed to launch within months, ROBB provided Investor B multiple excuses for why the MEV bot was not developed or launched, including an alleged suicide attempt by ROBB's sister.

37. In and around September 2023, approximately 10 months after Investor B's initial investment, Investor B approached ROBB about a refund. Investor B had not received any money from ROBB nor any indication the MEV bot was developed. On September 27 and October 13, 2023, Investor B received a partial refund from ROBB totaling \$75,000. As of the date of this affidavit, Investor B had not received the remaining \$439,443 owed by ROBB nor any profits from the MEV bot.

Investor C

38. In and around September 2023, Investor C saw a post by ROBB on Friend.Tech advertising an opportunity to invest in a MEV bot. Through conversations on Friend.Tech, X, and Telegram, ROBB told Investor C, among other representations, that Investor C's investment would be used by the MEV bot to execute trades. ROBB claimed the bot was almost ready to go and the trades would result in "six figure returns" within a week. Further, ROBB described Investor C's investment in the MEV bot as a "risk free" investment. ROBB's representations to Investor C are similar in nature to those captured in the screenshots provided by Investor A.

39. ROBB told Investor C their investment must be sent to an Ethereum virtual currency address operated by ROBB and then through other virtual currency addresses. As with Investor A, ROBB claimed he must "obfuscate" the funds or else the MEV bot strategy would be "ruined." On or about September 5, 2023, Investor C sent approximately \$100,000 to ROBB for investment in the MEV bot.

40. Approximately two months later, ROBB informed Investor C that new investors were investing significant funds that would dilute Investor C's initial investment and that Investor C needed to invest more money. Investor C therefore invested an additional \$25,000 in the MEV bot on or about November 2, 2023. At this time, ROBB assured Investor C that the release of the bot

was a matter of when, not if. At this moment, Investor C was worried ROBB would run away with their money.

41. A review of records shows that upon receipt of funds from Investor C, ROBB sent the funds through multiple virtual currency addresses before depositing the funds to ROBB's Coinbase account.

42. Investor C tried to get a refund from ROBB, but ROBB refused. In January 2024, ROBB requested Investor C invest more money in the MEV bot, but Investor C declined. As of February 26, 2024, Investor C had not received any funds from ROBB nor profits from the MEV bot. Investor C has stated that if he knew at the time he made his investments that ROBB still would not have launched the bot by now, he would not have invested.

43. The FBI has interviewed and/or received complaints from approximately eight other individuals who similarly reported being induced by ROBB to invest in an MEV bot. These individuals have not received profits from the investment or refunds when requested.

III. Laundering of Funds Derived from the Fraud, Including Use of Investor Funds for Personal Expenses

44. A review of account records and statements for numerous bank and virtual currency exchange accounts associated with ROBB shows ROBB received approximately \$1.5 million from individuals I have confirmed or believe to be investors in ROBB's MEV bot, based on interviews of investors, correspondence received from third parties, and similarities among the transactions. Despite ROBB's representations to investors claiming investor funds would be used as trading capital for the MEV bot, the records show that investor funds were funneled to virtual currency exchange accounts and traditional bank accounts held in ROBB's name. The funds were ultimately used to pay for personal expenses. There is no evidence that any of these funds were ever used for trading, software development, or business expenses.

45. Through conversations with investors, records provided by virtual currency exchanges and banks, and analysis of records and the blockchain, I learned ROBB used multiple virtual currency addresses, virtual currency exchange accounts and bank accounts as well as the purchase of goods to launder proceeds of the criminal scheme. Specifically, ROBB transferred investor funds between multiple virtual currency addresses, deposited funds to his virtual currency exchange accounts, split funds between different accounts, and then ultimately transferred the investor funds to his personal bank accounts. Because the blockchain is otherwise public, these numerous transfers and mixing of funds made it difficult for any of his investors to track their funds and realize they were not being used for the promised purposes. From his personal bank accounts, ROBB used investor funds to make personal purchases as described in Section III. In my training and experience, I know that individuals move funds between multiple accounts to obscure the source of funds and disguise ownership in an attempt to launder illicit proceeds. As noted above, ROBB told some investors that he needed to “obfuscate” the source of funding.

46. For example, on or about September 8, 2023, at ROBB’s direction, Investor A sent three transactions of USDC totaling approximately \$100,000 to an Ethereum virtual currency address ending in -f147 (“Ethereum Address 1”). In three transactions executed between September 26 and October 3, 2023, ROBB transferred the funds to three separate Ethereum addresses; from there, ROBB transferred the funds to his Coinbase account. The transfers are summarized as follows:

- a. On September 26, 2023, ROBB transferred 50,000 USDC from Ethereum Address 1 to an Ethereum virtual currency address ending in -e183. Within minutes, the funds were deposited into ROBB’s Coinbase account. That same day, ROBB transferred \$20,000 from his Coinbase account to his Bank of America bank account, \$5,000 to his Wells Fargo bank account, and \$5,000 to his JPMorgan Chase bank account.

- b. On September 27, 2023, ROBB transferred 25,000 USDC from Ethereum Address 1 to an Ethereum address ending in -690F. Within minutes, the funds were deposited into ROBB's Coinbase account.
- c. On October 3, 2023, ROBB transferred 25,004 USDC from Ethereum Address 1 to an Ethereum virtual currency address ending in -4712. Within minutes, the funds were deposited into ROBB's Coinbase account.

47. On October 28, 2023, at ROBB's direction, Investor A sent a 50,000 USDC transaction totaling approximately \$50,000 to an Ethereum virtual currency address ending in -dcDe ("Ethereum Address 2"). Through five transactions executed within the next 11 days, ROBB transferred the USDC in Ethereum Address 2 to two Ethereum virtual currency addresses, from which ROBB transferred the funds to his Coinbase account. The transfers are summarized as follows:

- a. From October 29 to November 3, 2023, ROBB transferred 35,000 USDC from Ethereum Address 2 to an Ethereum address ending in -80DF.
- b. From November 6 to 8, 2023, ROBB transferred 15,000 USDC from Ethereum Address 2 to an Ethereum address ending in -717E.
- c. Within minutes of receipt, the two Ethereum addresses sent the funds received from Investor A to ROBB's Coinbase account.

48. A review of ROBB's Coinbase account reveals that ROBB transferred funds received from Investor A to ROBB's bank accounts at Wells Fargo, JPMorgan, and Bank of America. A review of financial statement from ROBB's bank accounts shows ROBB used funds from Investor A for purposes not disclosed to or approved by Investor A (who believed that his funds would be used to invest), to include airline tickets, sporting event tickets, and purchases at casinos.

49. From November 2022 through January 2024, ROBB deposited approximately \$1.1 million in this manner into his personal Bank of America bank account and approximately \$417,900 into a personal JPMorgan Chase bank account.

50. Further, a review shows ROBB spent large sums of investor money on personal expenses. Some examples of ROBB using investor funds for personal expenses are summarized as follows:

a. Between September 4 and 5, 2023, ROBB received three deposits to his Coinbase account totaling over \$250,000. The funds derived from a payment from an investor known to the FBI and other payments FBI believes are associated with other investors. On September 5, 2023, ROBB executed six transfers totaling \$215,924.61 from his Coinbase account to his Bank of America account, which had a prior balance of \$6,532.09. On the same day, ROBB sent a wire totaling \$204,423 to Stadium Management Company, a management company for Mile High Stadium and the Denver Broncos Football Club. A review of records provided by the Denver Broncos Football Club shows ROBB purchased a two-year lease for an executive suite at the Denver Broncos' Mile High Stadium for the 2023 and 2024 National Football League seasons. ROBB's payment to the Bronco's on September 5 was transmitted through a server located in the Eastern District of Virginia.

b. On or about September 6, 2023, ROBB received three deposits to his Coinbase account totaling approximately \$129,235 that were consistent with investor payments. On the same day, ROBB transferred approximately \$126,399.26 from his Coinbase account to JPMorgan Chase account, which had a prior balance of \$744.67. On the same day, ROBB made a payment of \$117,570.00 from his JPMorgan Chase account to Stew Hansen Dodge City. A review of records from Stew Hansen Dodge City shows ROBB used the funds to purchase a 2023 Jeep Wagoneer vehicle.

c. From approximately October 8 to October 11, 2023, ROBB received four deposits to his Coinbase account totaling approximately \$151,400 that were consistent with investor payments to ROBB. Between October 11 and 12, 2023, ROBB transferred approximately \$68,582.52 from his Coinbase account to his Bank of America account. Shortly after, on October 12, 2023, ROBB wired \$46,914.50 from his Bank of America account to Atlantis Paradise Vacation. Open-source research shows Atlantis Paradise is an ocean-themed vacation resort on Paradise Island in the Bahamas.

IV. Ongoing Activity

51. Through conversations with victims and witnesses as well as a review of bank and virtual currency exchange account records, I learned ROBB continues to actively provide excuses for MEV bot launch and refund delays. I also learned ROBB is actively soliciting investment from new investors.

52. ROBB actively provides excuses for MEV bot and refund delays to include extortion and threats to his safety. For example, ROBB accused an investor of being involved in a conspiracy to murder ROBB and accused another investor of reporting him to the FBI and thus creating legal delays. A screenshot of the Telegram message from ROBB is included below (with the investor's profile picture redacted):



53. In addition to soliciting investment in the MEV bot, ROBB is actively promoting and seeking investment in a new cryptocurrency token called “\$RAT”. ROBB continues to claim large returns for investment in the MEV bot and tokens. For example, I learned from an investor that on or around February 27, 2024, ROBB posted a message about the MEV bot and tokens to Telegram. The message contains an image with the text “poof you’re a millionaire” and states being a millionaire could “easily” be the case for many investors. Further, ROBB implied the returns are

imminent, stating that “sometime tonight, this journey begins!” A screenshot containing the image and ROBB’s Telegram message is included below:



54. A review of ROBB’s Coinbase account shows that as of February 2024, ROBB continues to receive large payments of Ether (ETH), USDC, and Solana (SOL). Due to the ongoing solicitation of investment through Telegram, the similarity in volume between known investor payments and the recent payments, and a lack of other identifiable income, I believe ROBB actively receives investment payments from new investors and will continue to solicit investment from additional investors.

CONCLUSION

55. Based on the foregoing, there is probable cause to believe that, beginning no later than November 2022 and continuing through the present, in the Eastern District of Virginia and elsewhere, ROBERT ROBB having devised and intending to devise a scheme and artifice to defraud investors to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals and sounds, to wit, a message transmitted via the internet on September 4, 2023, to Investor A, in violation of Title 18, United States Code § 1343 (Wire Fraud).


56. I therefore respectfully request an arrest warrant authorizing the arrest of ROBB.

Respectfully submitted,



Jordan A. Jenkins
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on March 15, 2024


Honorable William E. Fitzpatrick
United States Magistrate Judge